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99-25

From: Justin Clifton <cliftonj@u.arizona.edu> on 03/26/99 07:45 AM GMT  
To: First\_Lady @ gateway  
cc.  
Subject: Low Powered Radio

[Connection Information]

CLIENT: 169.197.34.88[169.197.34.88]  
BROWSER: Mozilla/4.0 (compatible; MSIE 4.01; Windows 95)  
URL: http://www.whitehouse.gov/WH/Mail/html/Mail\_First\_Lady.html

[Sender Information]

PERSONAL-NAME: Justin Clifton  
EMAIL-ADDRESS: cliftonj@u.arizona.edu  
ORGANIZATION: KAMP Student Radio, University of Arizona  
RELATIONSHIP: General Manager  
STREET-ADDRESS: 1307 E. Mountain Place  
CITY: Tucson  
STATE-PROVINCE: Arizona  
ZIP-CODE: 85719  
COUNTRY: United States

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JUL 26 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

[Message Information]

PURPOSE: Offer neutral commentary, advice, or a suggestion  
TOPIC: Education  
AFFILIATION: Student - College or University  
SUBJECT: Low Powered Radio

[Message]

Dear Mrs. Clinton:

I am writing to you on behalf of the University of Arizona, and our college radio station, KAMP Student Radio. For the past 11 years, the student volunteers here at KAMP have provided the University with unique radio programming. Despite not having a detectable frequency from which we broadcast, we have built our volunteer base from the original ten who started the station, to just over 200 volunteers, and we have played an important role in campus life. Unfortunately, without a detectable frequency, our listener base is too limited.

Recently, the FCC has proposed rule making that would allow stations such as ours the opportunity to broadcast on a Low Powered FM (LPFM) frequency. As you can imagine, we were excited about such a possibility. Just the thought of increasing our audience and better serving our fellow students has been enough to motivate our organization to launch a massive support campaign for LPFM.

To date, we have gained the support of the entire campus (35,000 students) through our Student Government and our Administration. Our university president has written a letter of support to the FCC as has our student body president. We

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have also personally informed 2,000 students regarding the LPFM proposal through our petition campaign. Our student Volunteers have truly worked very hard to gain support for this issue.

KAMP has served as an educational base for our nations future (and current) professional broadcasters. We provide experience in all aspects of radio and have recently expanded to include cable television through our residence halls. Many of our Alumni have gone on to professional careers in broadcast media, and many more aspire to be professional broadcasters. All of these accomplishments were reached without a detectable frequency. Imagine the experience we could provide with a larger market.

Low Power FM is not solely a UA problem however. Currently there are around 140 Universities throughout the US without a detectable frequency for their college radio stations. Furthermore, this is not only a University issue. Community governments, public schools, church groups, neighborhoods, and private, not-for-profit broadcasters could utilize LPFM to communicate to their respective communities. The benefits are endless and will prove to serve the community voice well.

I would like you to think about LPFM as a tool for community, family and education. Please support the FCC proposal.

If you could respond with your stance on this issue, I would greatly appreciate your time and effort.

Thank You.

Sincerely,

Justin W. Clifton General Manager KAMP Student Radio  
University of Arizona 520-621-7584

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99-25

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6-12-99

Roosevelt B. Cooper III  
2925 Columbia Dr  
P.O. Box 900  
Portage, Wisconsin  
53901

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JUL 26 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Low Power Broadcasting Radio Stations

To whom it may concern:

Please send me information on how to apply for  
or rules for low power broadcasting radio stations  
(AM/FM). Please include FCC form 349, 350 and  
fact sheet, also any other information relevant to  
low power FM broadcast radio stations.

Thank you in advance,

Roosevelt B. Cooper III

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MM 99-25

The cost, even at a considerable reduced rate would in time be a burden on most, not all nonprofit organizations. Non commercial stations rely on state funding, grants, underwriting, and listener contributions. A LPFM could not expect state funding, but would in some areas be liable for state and local taxes. In most instances underwriting, and listener contributions would not be enough to cover the day to day, even on a limited basis, operation and maintenance cost. In most cases, it costs more to operate a non commercial station than a commercial station, and the same would be true if the LPFM where under a strict non commercial mandate. Without funding, grants, donations these LPFM non commercial stations would be destined to fail. Only the rich could afford to maintain these local non commercial stations, diluting the diversification of voices proposed by the creations of the LPFM.

If it is the intent of the FCC to create ownership opportunities, and to diversify, the only option for the creations of these LPFM is for them to be commercial stations. This would give people intent on owning and operating a radio station a fair chance in an open market, given that the profit margin would already be greatly diminished by the reachable share in the LPFM market. If their product is superior, and people listen, advertisers would buy time. The creation of the LPFM could even capitalize on the fact, reported in the recently released FCC study on Advertising, that major advertisers pay urban station considerably less regardless of ratings for reaching the same audiences. For the owner of a LPFM station those same ads dollars even at a lower rate would still be a benefit due to the lower cost restrictions for owning and operating a LPFM.

One of my biggest concerns is the future. If LPFM come into existence will there be enough foresight to plan for the total digital radio age? Will LPFM go the way of Lower Power Television stations that are now being left out of the digital transformation because of costs? My organization would be one of the first groups to apply for a station, but I would hate to be in the position of the owners of Low power television stations. The FCC has given away spectrum to the owners of full power television station without any consideration to LPTV owners. Will this happen to LPFM? Without planning it will, and this attempt to create new opportunities will be a farce.

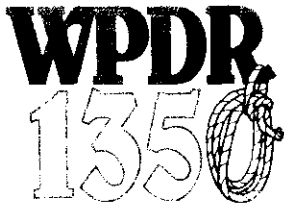
In closing I would like to say that any creation of a new medium should be given careful consideration. If the objective to create this medium is to diversify ownership, then all effort should be put in place not only for the creation, but the long term stabilization of growth within the LPFM market.

Thank you for allowing me to voice my opinions.



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Kramer Broadcasting, Inc.  
WPDR - WDDC

Highway 51 South  
Post Office Box 300  
Portage, Wisconsin 53901  
(608) 742-8833 (800) 362-9631

July 23, 1999

Magalie Roman Salas, Office of the Secretary  
TW-A306, Federal Communications Commission  
445 12th St, SW  
Washington DC 20554

The purpose of this letter is to express strong opposition to the low power FM proposal,  
**MM Docket 99-25.**

It has come to my attention that technical guidelines preclude LPFM stations in the top 50 to 75 markets, markets where great numbers of minorities live. I also understand that interference with existing FM services is very real, especially to people in their cars needing weather and other emergency information who could drive through pockets dominated by LPFM signals.

While negative economic impact on existing services such as ours is presumably to not be considered, I don't see how it can be ignored. Even the proposed rulemaking makes several references to economic impact. My stations have not made a profit in years despite great effort at cost controls. Perhaps we should eliminate the jobs of those who actively serve our local community, forget about the excellent local news and information services we offer and put in satellite music programming. Perhaps we should eliminate the daily community affairs and other local call-in programs we offer. If it weren't for the deaths of my aunt and mother and resulting inheritances, I would not have been able to keep up with equipment needs.

The addition of LPFM stations in our area will most certainly spell the death knell for many excellent small market community service stations like our WPDR and WDDC which I've operated for a quarter century.

Only minimal service, satellite programmed stations will become practical.

Its difficult enough as it is to offer genuine community radio service, that's also affordable to small local businesses. Please don't compound the problem by pouring a bunch of LPFM stations on us.

Sincerely,

Kramer Broadcasting, Inc.  
Ed Kramer, Pres/GenMgr

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**5000 WATTS  
IN STEREO**

GERARDI BROADCASTING CORP. • P.O. BOX 231, PUTNAM, CT 06260 • (860) 928-1350

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July 19, 1999 JUL 26 1999  
FCC MAIL ROOM

TO: Office of the Secretary, Federal Communications Commission  
FROM: Michael J. Gerardi, President, WINY  
RE: Comments on Low Power FM (FCC Docket #MM99-25)

To Whom It May Concern:

On Tuesday, May 4, 1999, my General Manager Gary Osbrey and I flew to Washington, D.C. to meet with Keith Larson, Assistant Chief for Engineering - Mass Media Bureau, to discuss our concerns about the proposed rulemaking for Low Power FM. Also in attendance were Bruce Romano, Robert Ratcliffe, and Charles Logan from the Mass Media Bureau. Representatives from Senator Christopher Dodd's office, Senator Joseph Lieberman's office and Congressman Sam Gejdenson's office also joined us.

At the conclusion of the meeting, we were advised to inform all FCC Commissioners of our concerns.

WINY is in favor of the establishment of Low Power FM with one caveat. Daytime license holders like WINY should have first refusal for any Low Power FM license in their community. The purpose would be to enhance the nighttime coverage of existing daytime broadcasters.

At WINY, we operate at 5,000 watts during daylight hours. At night, we are required to reduce our power to 79 watts in order to protect other stations. Many daytime stations operate with even less nighttime power. Our 79-watt signal cannot be taken seriously. There have been occasions when the skywave interference is so bad that you can see our tower and not hear our station. We don't even cover our entire city of license, let alone the other 9 towns in Windham County that we serve during the day. At night, WINY becomes a tiny, hard to hear voice in a world of FM signals.

Our programming is family friendly and community oriented. We feature 18 live local newscasts each day and recorded local newsbreaks every hour at night for a total of 30 local newscasts per day. We have a two-hour live call-in talk show each weekday. We broadcast 12 live local sports reports each day as well as high school football, basketball, baseball and soccer games. We broadcast important town meetings and political debates. Our morning show features guests from the community every day who promote fundraisers, spaghetti suppers, youth activities and special events. WINY employees volunteer for the Rotary Club, March of Dimes, American Cancer Society, Day Kimball Hospital, the local community college and much more.

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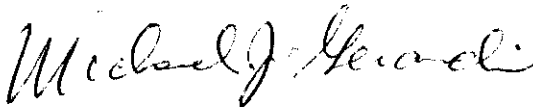
Consider our position. Here we are serving our community in an exemplary fashion since 1953. I have been at the station since 1957 and have been the owner since 1989. We eagerly embraced AM stereo in the early 80's and broadcast in AM stereo today. We began broadcasting 24 hours a day when our 79-watt nighttime power was granted. We have seen Docket 80-90 FM's flood the market with robust FM signals. And don't forget 2 thriving cable-tv systems as well as a good amount of print competition. Through it all we have maintained our commitment to local programming, resisting the temptation to fill our airwaves with syndicated shows. And now, Low Power FM looms on the horizon. Please don't miss this opportunity to fix an existing problem. Make it possible for daytime license holders to easily up-grade with a Low Power FM signal. Daytime stations like WINY are doing what the FCC originally mandated - serving the community.

With a low power FM license, WINY will do even more. An FM signal would give us greater nighttime coverage for more local, community programming. We would not squander a good nighttime signal. Instead, we would use additional night coverage to expand our community service. If Low Power FM service is approved by the FCC and it is determined that a frequency is available in our area, we believe that WINY should be awarded the license. If Low Power FM service is approved, please include much needed relief for existing daytime license holders.

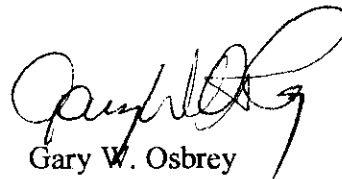
Senators Dodd and Lieberman and Congressman Gejdensen are well aware of WINY's lack of nighttime coverage and they support our efforts to enhance our nighttime signal with Low Power FM service. WINY is a must-visit location for our congressional delegation when they are in Windham County. They frequently appear live on our talk show to discuss constituent's concerns.

Sincerely,

GERARDI BROADCASTING CORP.



Michael J. Gerardi  
President/WINY



Gary W. Osbrey  
General Manager

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SUNBURST  
MEDIA, LP

3911 South 1st Street  
Abilene, Texas 79605

July 20, 1999

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JUL 26 1999

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Reference: MM Docket No. 99-25

I strongly oppose the move to add any more frequencies to the airwaves for concept of "Low-Power FM" for the following reasons:

1. The proposed relaxation of interference protection contours that are two and three frequencies away from any chosen frequency in order to permit the addition of the new Low Power FM frequencies into the spectrum is without precedent in undermining the technical integrity of the FM broadcast band. The elimination of these interference protection contours will possibly destroy the integrity of the FM broadcast as we know it today. The interference caused by these additional stations will be substantial and may preclude America's broadcasters from being able to move into the digital age with digital FM broadcasting in the future.
2. In the proposed rulemaking, very few, if any additional frequencies can be allocated to the major cities of the United States. If it is to provide more frequencies to the very large cities and therefore provide the opportunity for no-air diversity, there cannot be additional frequencies allocated, under any circumstance. Therefore, the proposed Low-Power FM stations have to be located in cities and towns other than the largest cities such as Abilene, TX, which already provides diversity in programming and ownership of the stations. One of the radio stations in Abilene from which I am writing, serves the Hispanic community with all Spanish language programming.
3. The FCC is strained now to enforce the rules and regulations for the existing Radio and Television stations. There is no way for the FCC with the current manpower, funding and field offices to: allocate, oversee construction, and most

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(915) 676-3851

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SUNBURST  
MEDIA, LP

3911 South 1st Street  
Abilene, Texas 79605

importantly police thousands of new FM stations in the country. The proposed rulemaking only offers the frequencies to persons that have no broadcast ownership and many that may apply will have no knowledge of how to properly construct and operate a Broadcast station. This could be a technical disaster.

4. Roy Stewart, Chief of the Mass Media Bureau, said the release of additional frequencies in the early 1980's in the famous docket 80-90 was the biggest mistake the FCC had ever made. The recent consolidation in the industry is the final response to the proliferation of the allocation of the thousands of additional frequencies to the United States. The consolidation was inevitable with the economic pressure placed upon the radio medium to remain viable, or even to exist.

Also, I do not understand how the proposed ownership limits for low-power stations, or the Commission's desire to license a certain favored group, can be reconciled with the Telecommunications Act of 1996 of the Balanced Budget Act of 1997.

I strongly urge the Federal Communications Commission to stop any further action on Low-Power FM.

Cordially,

Dean R. Minnick  
General Manager Sunburst Media  
Abilene Texas

KBBA-AM  
KEAN-AM  
KEAN-FM  
KEYJ-FM  
KORQ-FM  
KULL-FM

P.O. Box 3098  
Abilene, TX 79604

Phone  
(915) 676-7711

Fax  
(915) 676-3851

**VAUGHAN E. GRAY, CAE**

**DOCKET FILE COPY ORIGINAL**

103 Bluebell Drive  
Georgetown, Texas 78628

Phone 512/864-3622  
Email vgray@texas.net

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JUL 24 1999

FCC JUL 22 1999

July 22, 1999

FCC  
Office of the Secretary  
1919 M Street N. W., Room 222  
Washington, DC 20554

RE: MM Docket 99-25

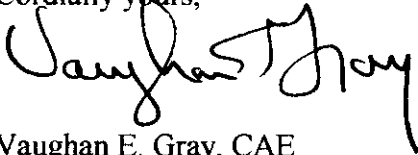
To Whom It May Concern:

The purpose of this letter is to express my interest in Community Radio.

I would hope that Sun City, Georgetown, Texas would be granted the necessary license to develop a Low Power FM Broadcast Station. It would mean a great deal to the people who live here.

We appreciate your positive consideration in this matter. Thanks!

Cordially yours,



Vaughan E. Gray, CAE

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***Good Time Rock N Roll!***

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JUL 26 1999

**KVRW-FM**

6206 NW Oak

Lawton, OK 73505

(580) 536-5343

Fax (580) 536-9007

Oldies@Oldies107online.com

6/25/1999

Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: MM Docket No. 99-25

I very strongly oppose the concept of "Low Power FM" radio stations.

I feel the proposed relaxation of interference protection contours in order to permit additional Low Power FM Frequencies would only cause the destruction of integrity to the FM Band. The interference caused by the additional stations would be substantial. And to radio stations, such as ours, who rely on quality of signal in relative fringe areas, it would be completely detrimental and possibly disastrous.

Also, it seems the areas that would be most affected by these new stations would be medium and small market locations, as most major markets have already reached a virtual frequency saturation. As a single owner station in one of these vulnerable markets, in all probability, we would not survive in any aspect - listenership, commercial value, or revenue.

And may I also add, the FCC is already strained to enforce the rules and regulations for existing Radio and Television stations. Is there any way, with the current manpower and funding, to police thousands of possible "rogue" Low Power stations?

Once again, I would like to state that I am very opposed to the addition of Low Power FM stations and strongly urge the FCC to stop any further action in its support.

Sincerely,

Arthur Patrick  
President  
Pat-Tower, Inc

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